

# On Target

### August 2015

### INCOME VERIFICATION....HOW MUCH IS ENOUGH?

This is a frequent question in the SNAP policy box, "Do I have enough information to code the case or do I need to pend for more verification? It can be a difficult question.

The conversation that you have with the customer is a key point in ensuring the income is calculated correctly on a case. Make sure you have a complete conversation about the current situation:

- $\Rightarrow$  Who is your employer?
- ⇒ How many hours do you work?
- ⇒ Do you expect your situation to change at work?
- ⇒ Talk about the income verification that the customer has (look at how often they are paid, is there overtime, bonuses or tips)

Your narration should reflect the conversation that you had with the customer. It needs to tell the story behind the decision that you made. For SNAP eligibility we look at income prospectively. To determine income prospectively, talk with the customer about their current situation. Take a look at the verification they have provided for the last month of income and determine with them if it is reasonable to consider this as representative of ongoing income. If it is representative, use the correct conversion method:

- $\Rightarrow$  4.3 for weekly pay
- $\Rightarrow$  2.15 for pay every other week
- $\Rightarrow$  2 for twice a month

If the customer does not have a month's worth of income; either because they have not been working long enough or the past is not representative, then you need to request verification from the employer. This could be a phone call to the employer to verify the information, or it could be something that the customer gets from their employer in writing.

**Example**: Jane is working for a call center. She is paid every other week. She brings her last two pay stubs to her interview, but tells you that her position changes and she is now working for the same company but in a different position. The second pay stub does reflect the new position. Can you use the one pay stub to verify the income?

**Answer:** No, because you do not have a month of representative income. You need to verify with the employer that the second check is representative of ongoing income

**SNAP Accuracy in Action Volume I, Issue I** can be found on the SNAP Web Tools page. In this edition, you will get answers to most earned income situation to this important question. *Income Verification...How much is enough?* 

Important note: This is clarification of existing policy.

#### **AUGUST 2015 CONTRIBUTORS**

Catherine McDonald

Chelsey Herrmann

Susan Becktold

Kris Rash

William Picha

SNAP Policy Analysts

TANF Policy Analysts

Quality Control

Quality Assurance

SSP Training Unit

JPT Unit

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### SNAP: 50/50 Custody Agreement

We have heard folks are incorrectly denying SNAP for children when the parents have a 50/50 custody agreement.

SNAP looks at household composition to determine who can and must apply together. Household comp for SNAP is based on the meals... not the time. When people live in more than one household during a calendar month, consider them in the household where they eat at least 51 percent of their meals. For SNAP, you do not even need to follow up on the custody arrangement because we take a client's statement on household comp. If they apply for a child, take their word for it. If the child is on another person's case, send the appropriate reduction notices to the other person and remove when appropriate. If the other parent disputes this, then you may need to do some more research.

If you do need to do more research, you need to ask specifically about the meals the child receives in each household. This will help you determine which household they are in. Sometimes you may even need to use a calendar to help you figure this out. If it is really close, you may even get the parents to agree to one having them the first six months and the other parent having them the second six months. This is an ok thing to do and we would expect workers to try to work out any reasonable option with the parents. If, for some rare reason the parents cannot agree on where the child gets the majority of their meals and neither is willing to budge, then and only then would we make the child ineligible for SNAP until they can come to some sort of agreement, or the situation changes.

You can find additional information on this in the FSM at SNAP.C.1.

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**Didja Know?** For the SNAP program, residency would end when someone has moved out of state and is no longer maintaining a residence here in Oregon. During the certification period customers are not required to report changes in address or residency because this is not part of the reporting requirements. Once someone has left the state the case would be closed either when the Department becomes aware that they have moved out of state, or at their next certification period. **Please note:** This does not include someone that is on an out-of-state vacation.

### **Requesting TA-DVS**

The customer may apply for the program in person, in writing, or by phone. The Department will <u>assess</u> the customer's safety concerns within eight working hours of receiving the application and will offer options to the customer for addressing immediate safety needs.

The Department will determine eligibility within sixteen working hours after the application is complete, whether or not the customer has signed the application.

No matter how the customer requests TA-DVS, either by phone, writing or in person we HAVE to determine safety within 8 hours.

Once the Department receives a TA-DVS application, signed or unsigned, we have 16 hours to determine eligibility, unless the customer oks an appointment outside of the 16 hours from receipt of application. If the customer is ok with moving the intake time, eligibility will need to be determined within 16 hours of the intake.

**IMPORTANT:** We need to ensure that we are narrating why we are not determining eligibility within the 16 hours of receipt of application.

Rule 461-135-1220

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### HAVE YOU HEARD ABOUT THE LATEST SCAM?

Here is the scoop: Apparently customers are receiving letters and phone calls from a group claiming to be from Oregon DHS. The letters look legit, the person on the other end of the line sounds professional, but customers are skeptical. So, the customer contacts the branch to verify the letter or person who called is the real deal....

### And guess what? WE ARE!!! It's us, Quality Control!!

We are contacting the customer because they have been randomly selected as a SNAP participant to have their case reviewed for the federal sample. We NEED to talk to the customer and verify their circumstances. If a customer calls or walks in to a branch office questioning the latest "SCAM" from someone at "Quality Control," tell them we are legit and encourage the customer to cooperate with our review! It is imperative agency staff are familiar with QC and encourage customers cooperate or else they are subject to disqualification of SNAP benefits for their ENTIRE FAMILY.

If agency staff are not aware of Quality Control, it's about time to get to know who we are and why we are here!

Quality Control

### SNAP Situations Where You Don't Need to Pend

- 1. Income verification and the amount on the application do not match—this should be addressed in the interview and only pend if necessary after the conversation. **Example:** Customer reports on application \$1200, but pay stubs reflect \$1500. You talk with the customer and they reported net instead of gross.
- 2. If you can, make contact with the employer to verify questionable or missing information—then document the conversation with the employer. Narrate who you speak with.
- 3. Seasonal employment—it is ok to take a customer's statement about a reduction in hours as long as it is an expected change and in line with the industry.
- 4. Marginal income—no exact definition of this term, but if it would be a hardship for an individual to get or keep documentation then it is not required.
- 5. Excluded income—educational income that is deducted from the cost of attending school when the cost of attending is more than the income that is received
- 6. Terminated source of income.
- 7. Job has not started yet—not on the schedule yet.
- 8. Verification was available on the Work Number or one of the screens available to us.
- 9. Employer verification provided by letter or phone.

Don't forget to have a conversation with the client and always narrate the conversation to support your eligibility decision.

SNAP Policy Analysts

## JP2 or J82 what is this?

JPT receives several emails a day asking how to treat certain changes in household comp. All very good questions. Our goal is to provide at least one example per month in the next editions of On Target to clarify JPI questions.

Q: A married couple with no children apply for SNAP benefits. The husband's 15 year old sister moved into the home last month and purchases/ prepares her meals with her brother. Is this household now potentially eligible for JP2 or J82 or neither?

A: If you answered "neither," step up and take a bow.

JP2 is available only to single parents with children who are between the ages of 6 and 17.

J82 is available only to 2-parent households with children in common who are age 17 and under.

In the situation above, the sister is under age 18, however, she is not the child of either adult in the home.

Please don't be afraid to ask, keep those questions coming and thank you for helping increase our participation rate.

William Picha. JPT Unit

### A common question is, "Why are cases reviewed differently for QC than for targeted reviews (QA)?"

The simple answer is while the overall objective to reduce payment and QC errors is the same, targeted reviews are intended to reduce the risk of QC errors before they happen.

Targeted reviews are normally limited to the same information available to the worker when the eligibility decision was made. The reviewer is looking at whether accurate information and department policy were applied in making the decision. Targeted reviews are intended as a coaching tool for staff, an information source for local managers and a measurement tool to identify trends, training needs and policy issues.

QC reviews, on the other hand, are primarily focused on what is called a "payment error rate" that must be reported to the federal government. QC has the advantage and disadvantage of additional information in that they re-interview and re-verify information from the Customer and the employer. QC also conducts reviews to ensure the state is in compliance and following federal policy. QC does everything they can to avoid errors in their findings because their findings reflect on the work of our Oregon staff.

The goal of each eligibility worker, lead, QA compliance specialist, and QC compliance specialist is the same, to issue correct benefits so each customer gets the benefits they are entitled to (not more, not less).

### NEWS AND UPCOMING TRAINING OFFERED BY THE SSP TRAINING UNIT

Our schedule, registration data, and waitlist information is updated weekly, and is available on the training unit's intranet site at

 $\underline{https://inside.dhsoha.state.or.us/dhs/self-sufficiency-training-unit/self-sufficiency-training-unit-resources.html}$ 

For more information regarding the SSP Core Training Outline:

https://inside.dhsoha.state.or.us/dhs/self-sufficiency-training-unit/self-sufficiency-training-unit-resources.html

Core Class offerings and begin dates:

**Essentials:** 9/1 Tigard, 10/6 Salem

**Computer Connections** 9/1 Salem, 9/22 Tigard, 9/29 Salem, 10/13

Portland, 10/20 Salem

**SNAP Basics** 9/22 Salem, 9/29 Tigard, 10/27 Portland,

10/27 Tigard, 10/27 Salem

ERDC 9/29 Tigard

**TANF Eligibility** 9/22 Salem, 10/27 Tigard

**TANF Case Management** 10/6 Salem **DV Policy & Case Planning** 10/1 Salem

Services to Noncitizens 9/1 Salem, 10/13 Tigard

Self-Employment None

Look for Webcasts and other Online courses for:

2015 SNAP Civil Rights – C04948 SNAP NED Eligibility and Coding – C03279

Job Participation Incentive (JPI) - C04877

**SNAP** Transitional Benefit Alternative (TBA) – C04708

Oregon Vital Event Registration (OVERS) Update Training – C03682

#### ANNUALIZED INCOME

It is only appropriate to annualize earned income in a few scenarios for SNAP. Here are the two: self-employment income for businesses that have been in existence for at least 12 months **AND** that 12 months is representative of ongoing income, or a contract employee that is not working as an hourly employee. School district employees are a good example of when a contract employee could be paid hourly.

A good rule of thumb is to look at a month when school is not in session the full month (December, March etc.) to see if the pay is affected.

Seasonal employment should not be annualized. These earnings are not intended to cover a full year. The customer's current situation should be reviewed to determine the correct income to code on the case. Changes in seasonal employment resulting in less or more hours may not need to be verified. For cases when the work situation is generally known in the community, it is acceptable to narrate the reduction in work hours without pursuing verification. The narration does need to support the decision to not request additional documentation.

**SNAP Policy Analysts** 

### JULY 2015 TARGETED SNAP REVIEWS

### 100% ACCURACY HONOR ROLL

0111	Baker City APD	1311	Burns APD	2019	Cottage Grove AAA
0310	Canby APD	1404	Refugee Branch	2311	Ontario APD
0701	Alberta SSP	1418	SE Portland AAA	2911	Tillamook AAA
0913	La Pine APD	1611	Prineville APD	3102	Enterprise SSP
0914	Redmond APD	1612	Madras APD	3111	La Grande APD
1202	Condon SSP	1911	Woodburn AAA	3112	Enterprise APD
1211	John Day APD			3211	Florence AAA

### 90% OR BETTER

98.33	McKenzie Center SSP	2001	93.10	Cottage Grove SSP	2003
98.25	West Eugene SSP	2002	92.86	Warrenton AAA	0411
96.61	Springfield SSP	1101	92.31	Oregon City APD	0311
96.55	East Multnomah SSP	3501	92.31	New Market Theater SSP	1402
96.15	North Bend APD	0611	92.00	Grants Pass RVCOG	1717
96.00	Roseburg SSP	1001	92.00	N/NE Portland AAA	2818
96.00	Albany AAA	2211	91.89	SE Portland SSP	1401
95.65	Klamath Falls APD	1811	91.67	Beaverton APD	3417
95.00	Bend APD	0911	91.11	Klamath Falls SSP	1801
95.00	Eugene LCOG	2011	90.00	Bend SSP	0901
95.00	St. Johns Family Center SSP	2601	90.00	Burns SSP	1301
94.74	Hillsboro APD	3411	90.00	D8 Processing Ctr SSP	1503
94.44	Milton-Freewater SSP	3004	90.00	W Medford Pro Ctr SSP	1504
93.75	Milwaukie APD	0313	90.00	Grants Pass SSP	1701
93.33	Redmond SSP	0902	90.00	Toledo AAA	2111
93.33	South Valley SSP	1502	90.00	North Salem AAA	2411
93.33	Lebanon SSP	2202	90.00	Florence SSP	3201
93.33	Santiam Center SSP	2404	90.00	The Dalles SSP	3301
93.33	Pendleton APD	3011			

### WORKER HONOR ROLL

Quality Assurance is publishing a Worker Honor Roll to call attention to the outstanding work done by so many of you in the field. The workers on the list will have SNAP targeted review accuracy rates of 95% or better in the past six months.

Is your name on the list?

You can find our here.

## SNAP PREVENTATIVE TIPS

- The discussion with the customer during the interview and then your narration about that conversation is one of the best tool to ensure an accurate case!
- Review the pay stubs. Pay frequency? Partial check?
  Potential tips? Additional income listed?
- Students who do not meet student criteria are not in the filing group. None of their income counts and no credit is given for any expenses they pay.
- Child Care providers paid through the DPU are considered self-employed.